


IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

FILED
JUL 03 2018
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  DEPUTY

CLINTON STRANGE,
Plaintiff

W18CA180

v.

GLOBAL VIRTUAL OPPORTUNITIES, INC.,
Defendant

Civil Action:

Complaint for Violations of the:

Telephone Consumer Protection Act 47 U.S.C. § 227

)

DEMAND FOR JURY TRIAL

)

Preliminary Statement:

This is an action brought by an adult individual who is a natural person against Defendant Global Virtual Opportunities, Inc. for violations of the Telephone Consumer Protection Act of 1991 ("TCPA"), under U.S Federal Statutes:

Telephone Consumer Protection Act 47 U.S.C. § 227(c)(5);

Telephone Consumer Protection Act 47 U.S.C. § 227(b)(1)(a)(iii);

Telephone Consumer Protection Act 47 U.S.C. § 227(b)(3)(B);

Telephone Consumer Protection Act 47 U.S.C. § 227(b)(3)(C);

Telephone Consumer Protection Act 47 U.S.C. § 227(e)(1);

&

Telephone Consumer Protection Act 47 U.S.C. § 227(f)(2).

Jurisdiction of this Court Arises Under:

Telephone Consumer Protection Act 47 U.S.C. § 227,

Because the action brought involves Federal Question Jurisdiction which specifically might be found at:

Telephone Consumer Protection Act 47 U.S.C. § 227(f)(2).

Venue Lies Properly in This Court:

Pursuant to 47 U.S.C. § 227(g)(4) & 28 U.S.C § 1391.

Parties:

Plaintiff is an adult individual residing at 7021 Winburn Drive, Greenwood, LA 71033.

Defendant Global Virtual Opportunities, Inc. is a Delaware Corporation Domiciled in the State of Texas and whose Principal Place of Business according to The Office of the Comptroller for the State of Texas is:

GLOBAL VIRTUAL OPPORTUNITIES, INC.

6701 GUADA COMA DRIVE

SCHERTZ, TX 78154

& whose registered agents are:

In Texas:

J. Bradley Jones

2161 North West Military Highway #400

San Antonio, TX 78213

In Delaware:

CORPOMAX INC.

2915 OGLETOWN ROAD

NEWARK, DE 19713

Factual Allegations:

1. Plaintiff's wireless cellphone number 318-423-5057 has been registered on the Federal Do-Not-Call Registry since 01/03/2018 *See Exhibit A*.
2. Plaintiff does not like to receive phone calls, texts, or SMS/MMS messages on his cellphone because they "intrude on his seclusion and violate his rights to privacy guaranteed under the U.S. Constitution", and further deplete plaintiff's memory storage capacity, deplete Plaintiff's battery level on his cellphone, and require him to use a measurable amount of mental and physical energy to review the contents of the unwanted SMS text spams. Plaintiff alleges that [he] has Article III standing as a result of Defendant's alleged conduct.
3. Plaintiff Clinton Strange is the wireless cellphone subscriber to the number 318-423-5057, and is financially responsible for the Verizon Account.
4. Plaintiff alleges that the Defendant or alternatively a 3rd Party Marketing Company hired by the Defendant sent more than one text message to the Plaintiff on his cellphone number 318-423-5057 within a 12-month period.
5. Plaintiff alleges that Defendant or alternatively a 3rd Party Marketing Company hired by the Defendant utilized an Automatic Telephone Dialing System ("ATDS") to send unwanted / unsolicited SMS / MMS text spam messages to Plaintiff's cellphone number 318-423-5057.
6. Plaintiff alleges that he received an unwanted SMS/MMS text spam message on his cellphone number 318-423-5057 on 05/14/2018 at 6:25pm CDT from 706-661-4792. The message read as follows:

"I hope you got my very last text message, I have been doing this for a month, Cha-Ching!

Click Here:

amazinmoneybiz.us/qdmq?c=1p0kf7".

7. The SMS/ MMS text spam message did not contain opt-out instructions.
8. The SMS text spam that Plaintiff alleges he received and can document is submitted as *Exhibit B*.
9. The text spam in Exhibit B references another text spam message that Plaintiff is unable to document at this time but believes he will be able to find proof of it and/ or others during discovery as the Text message sent on 05/14/2018 refers to [it].

10. Plaintiff sometime later after receiving the unwanted SMS text spam 'clicked' on the link provided in the text and it navigated him to the 'sites' as follows:

See Exhibit C;

See Exhibit D;

&

See Exhibit E.

Plaintiff 'clicked' on the links only to discover who was texting [him] in order to convey a 'Do-Not-Call request/ Stop texting me' Demand.

11. The Webpage in Exhibit E is operated by the Defendant, and lists the Defendant's address [matching] as listed with The State of Texas:

6701 Guada Coma Dr.

Schertz, Tx 78154

12. The Plaintiff drafted a letter (*See Exhibit F*) and dispatched it to the Defendant on 05/15/2018. Defendant responded to Plaintiff in an email dated 05/31/2018 at 4:53pm CDT from 'Ilona Therien' that "our office" had received the letter (Exhibit F), and "Please do not hesitate to contact me if the messages you were receiving have not stopped." *See Exhibit G.*

13. Plaintiff understands that by the statement in the email (Exhibit G) that the Defendant has control over the SMS Text Spam Plaintiff alleges to have received from the Defendant, or alternatively from a 3rd Party Marketing Company hired by the Defendant.

14. Defendant sent an email to the Plaintiff on 06/06/2018 at 10:05am which stated in part:

"We reached out to a few marketing firms promoting our products..."

See Exhibit H.

15. Defendant sent an email to the Plaintiff on 06/06/2018 at 1:33pm CDT and it stated in part:

"Not sure if you know how a network works but this is the network we use

<https://nexusoffers.com/> " *See Exhibit I.*

16. Plaintiff alleges that although Defendant claims [it] did not directly send the unwanted Text Spam messages to Plaintiff's cellphone number 318-423-5057 they are still liable to the Plaintiff as the messages:

a- Were sent on behalf of the Defendant *See Exhibits C, D, & E.*

b- The Defendant would benefit from the 'outcome' of the 'sent spam texts'.

c- Defendant did "reach out to" 3rd Parties to promote their products *See Exhibits H & I.*

d- Defendant had 'control' over sent text messages sent to Plaintiff's cellphone number 318-423-5057 *See Exhibit G.*

17. The Telephone Consumer Protection Act 47 U.S.C. § 227(b)(1)(a)(iii) states in part that:

(b) RESTRICTIONS ON USE OF AUTOMATED TELEPHONE EQUIPMENT

(1) PROHIBITIONS It shall be unlawful for any person within the United States, or any person outside the United States if the recipient is within the United States

(A) to make any call (other than a call made for emergency purposes or made with the prior express consent of the called party) using any automatic telephone dialing system or an artificial or prerecorded voice

iii)

to any telephone number assigned to a paging service, cellular telephone service, specialized mobile radio service, or other radio common carrier service, or any service for which the called party is charged for the call, unless such call is made solely to collect a debt owed to or guaranteed by the United States

18. The Telephone Consumer Protection Act 47 U.S.C. § 227(c)(5) states in part that:

(c) PROTECTION OF SUBSCRIBER PRIVACY RIGHTS

(5) PRIVATE RIGHT OF ACTION A person who has received more than one telephone call within any 12-month period by or on behalf of the same entity in violation of the regulations prescribed under this subsection may, if otherwise permitted by the laws or rules of court of a State bring in an appropriate court of that State—

(A)

an action based on a violation of the regulations prescribed under this subsection to enjoin such violation,

(B)

an action to recover for actual monetary loss from such a violation, or to receive up to \$500 in damages for each such violation, whichever is greater, or

(C)

both such actions.

19. Courts have upheld that Defendant's are liable for the actions of 3rd parties when [they] hire 3rd party companies to market their products and services. *See Krakauer v. Dish Network LLC*, No. 1:14-CV-00333, M.D.N.C.;
&
United States of America et al v. Dish Network LLC, No. 3:09-CV-03073, C.D. Ill.
20. The term "'agency' means more than mere passive permission; it involves request, instruction, or command." *See Taco Bell I*, 879 F. Supp. 2d at 1084.
21. The Telephone Consumer Protection Act 47 U.S.C. § 227(e)(1) states in part that:
(1)IN GENERAL
It shall be unlawful for any person within the United States, in connection with any telecommunications service or IP-enabled voice service, to cause any caller identification service to knowingly transmit misleading or inaccurate caller identification information with the intent to defraud, cause harm, or wrongfully obtain anything of value, unless such transmission is exempted pursuant to paragraph (3)(B).
22. An agreement, contract, and or mise existed between Defendant Global Virtual Opportunities, Inc. and the legal entity that owns and operates nexusoffers.com.
23. The Plaintiff believes that the conduct of the Defendant's and or their 3rd Party marketing partners arises to a level worthy of Trebled Damages under the TCPA.
24. The TCPA provides at 47 U.S.C. § 227(b)(3)(C) in part that trebled damages can be awarded by the court for willful and / or knowing violations by the Defendant:

C)

both such actions.

If the court finds that the defendant willfully or knowingly violated this subsection, or the regulations prescribed under this subsection, the court may, in its discretion, increase the amount of the award to an amount equal to not more than 3 times the amount available under subparagraph (B) of this paragraph.

25. Defendant is a Delaware Corporation Domiciled within the State of Texas *See Exhibits J & K*.

26. At all times pertinent hereto Defendant was acting by and through their agents, servants and / or employees who were acting within the course and scope of their agency or employment, and under the direct supervision and control of the Defendant herein.
27. At all times pertinent hereto, the conduct of the Defendant, as well as that of their agents, servants and/ or employees was intentional, reckless, and in grossly negligent disregard for Federal Laws and the rights of the Plaintiff herein.

Count I:

28. Plaintiff incorporates the foregoing paragraphs as though the same were set forth at length herein.
29. At all times pertinent hereto the Defendant was liable to the Plaintiff for violations of:

Telephone Consumer Protection Act 47 U.S.C. § 227(c)(5)

Which makes Defendant liable to Plaintiff for at least 2 trebled violations as evidenced in the complaint and Plaintiff seeks \$3,000 in damages for said violations.

Count II:

30. Plaintiff incorporates the foregoing paragraphs as though the same were set forth at length herein.
31. At all times pertinent hereto the Defendant was liable to the Plaintiff for violations of:

Telephone Consumer Protection Act 47 U.S.C. § 227(b)(1)(a)(iii)

Which makes Defendant liable to Plaintiff for at least 2 trebled violations as evidenced in the complaint and Plaintiff seeks \$3,000 in damages for said violations.

Jury Trial Demand;

Plaintiff demands trial by jury on all issues so triable.

Prayer for Relief;

WHEREFORE, Plaintiff seeks judgement in Plaintiff's favor and damages against the Defendant, based on the following requested relief:

Statutory Damages;

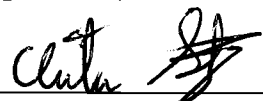
Treble Damages;

Enjoinder from further violations of these parts;

Costs of litigating the action together along with all reasonable attorney's fees (if any) and court costs;

And such other and further relief as may be necessary, just and proper.

Respectfully Submitted,

X 
Clinton Strange
7021 Winburn Drive
Greenwood, LA 71033
318-423-5057
parsmllc@gmail.com

7-3-2018
Dated

EXHIBIT A

1/3/2018

National Do Not Call Registry



FEDERAL TRADE COMMISSION
PROTECTING AMERICAN CONSUMERS

[About the Registry](#) | [Privacy & Security](#) | [Help](#)



National Do Not Call Registry

[En Español](#)

Registration Complete

You have registered the following telephone number in the National Do Not Call Registry:

(318) 423-5057

You may print this page if you wish to retain a copy for your records.

[Back to ftc.gov](#) | [Privacy Policy](#)

EXHIBIT B

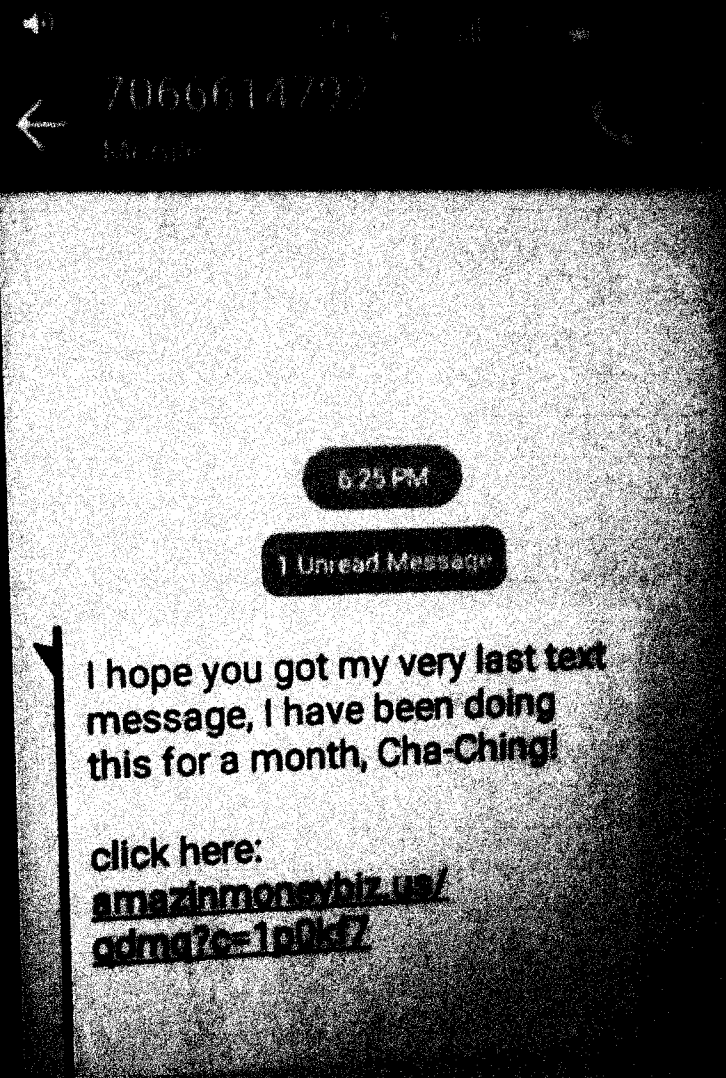


EXHIBIT C



Message Info

From 7066614792

Received 6:25 PM

Type Text message

Size 139 bytes

Uid 0

Message Source Phone

Thread Id 127

Native Thread Id 133

Msg DB Id 1393

Native Id 1080

Date Mon May 14 18:25:38 CDT 2018

HIDE DETAILS

CLOSE



51%

Message Info

From 7066614792

Received 6:25 PM

Type Text message

Size 139 bytes

Sent To

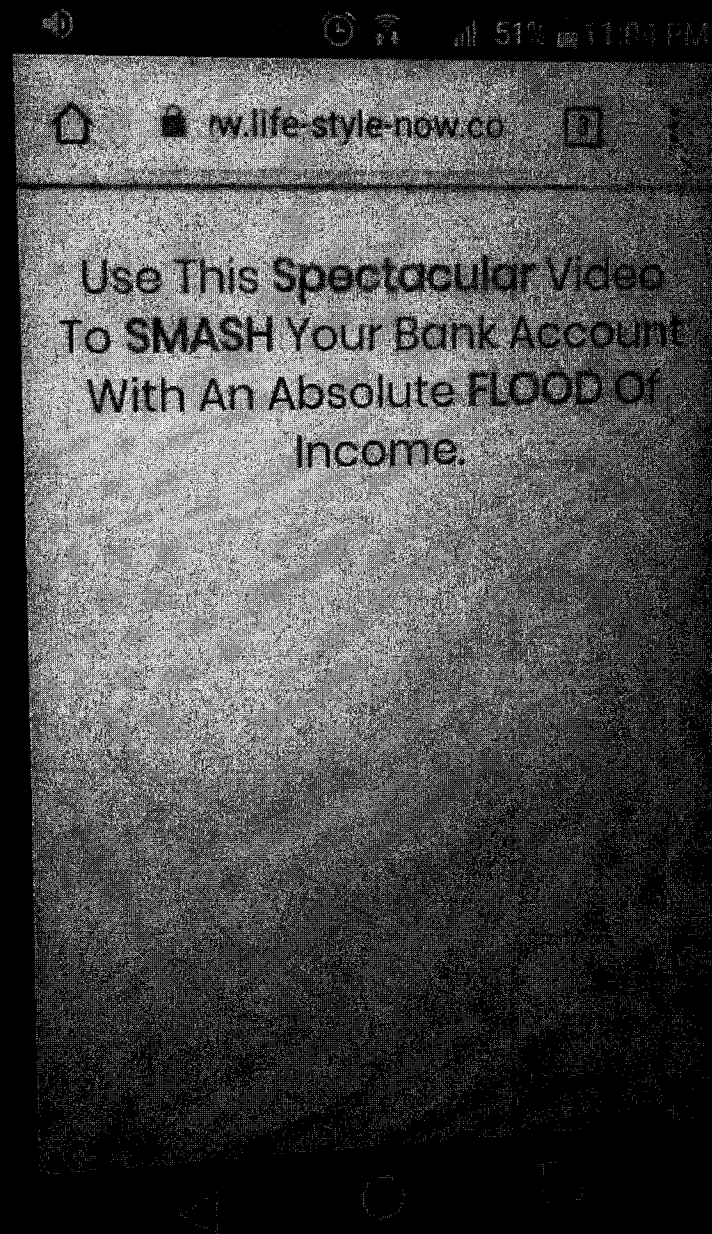


Me

Mobile: 3184235057

VIEW DETAILS

EXHIBIT D



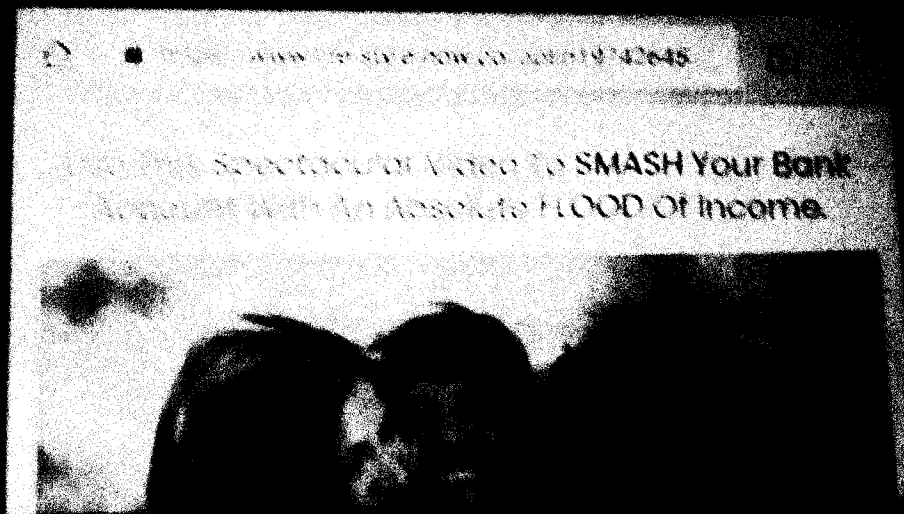
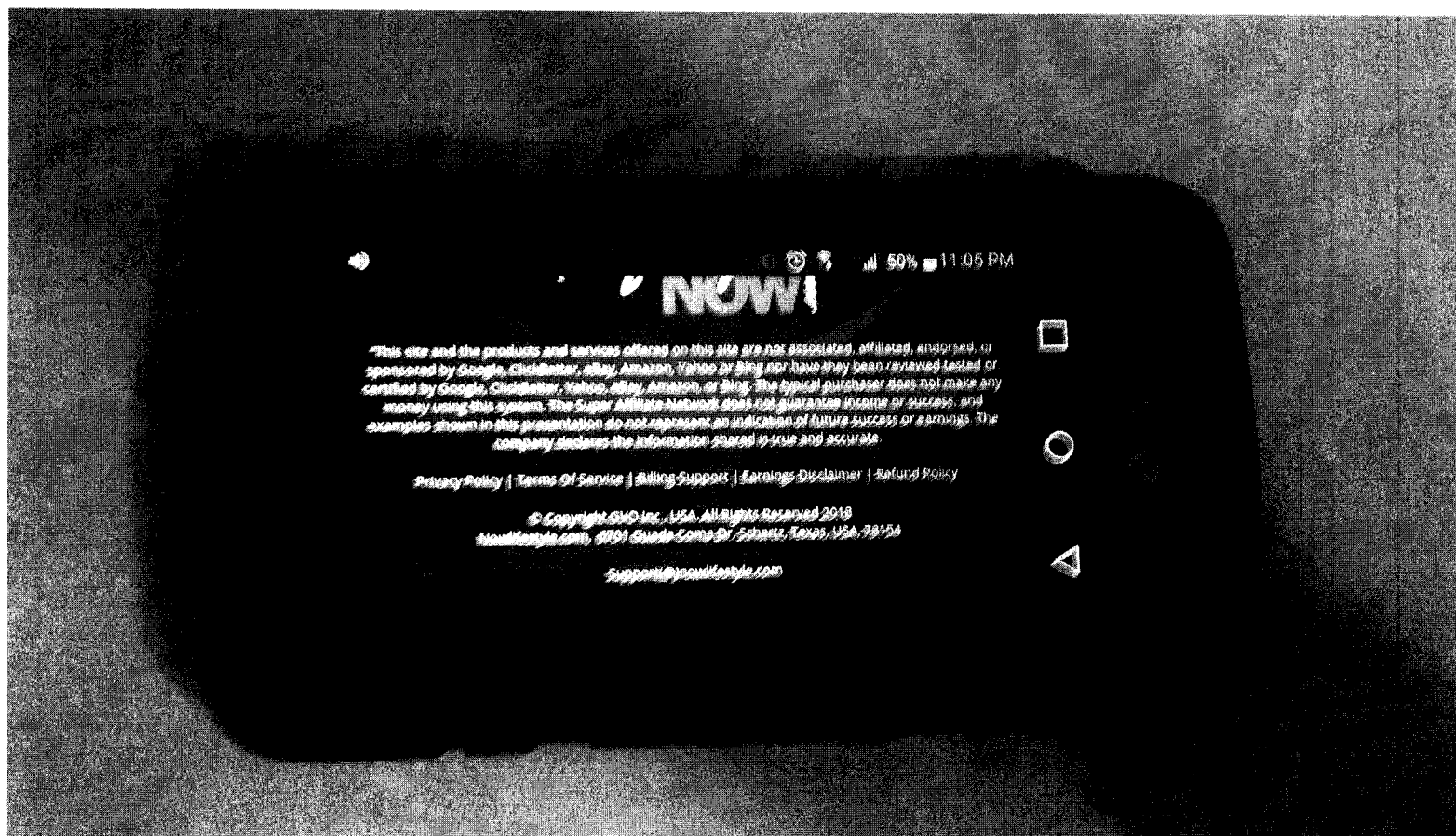


EXHIBIT E



"This site and the products and services offered on this site are not associated, affiliated, endorsed, or sponsored by Google, ClickBank, eBay, Amazon, Yahoo or Bing nor have they been reviewed, tested or certified by Google, ClickBank, Yahoo, eBay, Amazon, or Bing. The typical purchaser does not make any money using this system. The Super Affiliate Network does not guarantee income or success, and examples shown in this presentation do not represent an indication of future success or earnings. The company declares the information shared is true and accurate."

[Privacy Policy](#) | [Terms Of Service](#) | [Billing Support](#) | [Earnings Disclaimer](#) | [Refund Policy](#)

© Copyright NOW! Inc., USA. All Rights Reserved 2018
Now!Style.com, 8191 Guadalupe Dr / Schertz, Texas, USA 78154

support@nowlifestyle.com

EXHIBIT F

Clinton Strange
7021 Winburn Drive
Greenwood, LA 71033
47USC227ETSEQ@gmail.com
318-423-5057

Greetings GLOBAL VIRTUAL OPPORTUNITIES, INC.;

or Defense Counsel:

I am Clinton Strange. I am the cellular telephone subscriber of 318-423-5057 "The Called Party". I allege that your Corporation sent me text messages without my express written consent including but not limited to one on 05/14/2018 at 6:25pm CDT either on behalf of yourselves or 3rd party marketing affiliates.

While I am a NOVICE in matters of the TCPA law, I am aware enough that I realize that your Corporation has exhibited actionable behavior relative to:

- a- Consent
- b- Use of an ATDS
- c- Disregard for the Federal Do-Not-Call Listing

I have enclosed documents to both aid and support my claims that I was:

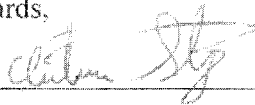
- a- was contacted via an ATDS
- b- am registered on the Federal Do-Not-Call Registry
- c- no consent was ever given to be contacted by your Corporation

The exhibits are marked "GVO Exhibits A-H".

If you need more details to determine liability exposure, and/ or to confirm any of the allegations I have made herein please do not hesitate to contact me by e-mail or regular mail by 06/29/2018. After this date I plan to move forward as I choose unless a pre-litigation resolution can be achieved.

Regards,

X



5-15-2018

Clinton Strange

Dated

EXHIBIT G

From: Ilona Therien
Sent: Thursday, May 31, 2018 4:53 PM
To: 47usc227etseq@gmail.com
Subject: Letter received to Global Virtual Opportunities

Dear Mr. Strange,

Please accept this email as your reference that our office has received a letter from you dated May 15, 2018.

Please do not hesitate to contact me if the messages you were receiving have not stopped.

Kind regards,
Ilona Therien

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the system manager. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the company. Finally, the recipient should check this email and any attachments for the presence of viruses. The company accepts no liability for any damage caused by any virus transmitted by this email.

EXHIBIT H

In no way did we admit we sent the text message because we didnt. Lets get that 100% clear.
In fact we have no idea who sent it. We reached out to a few marketing firms promoting our products so we were here to help you not hinder you.

Again we did NOT send any text message nor do we own ant text messaging service.

Joel Therien

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the system manager. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the company. Finally, the recipient should check this email and any attachments for the presence of viruses. The company accepts no liability for any damage caused by any virus transmitted by this email.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the system manager. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the company. Finally, the recipient should check this email and any attachments for the presence of viruses. The company accepts no liability for any damage caused by any virus transmitted by this email.

EXHIBIT I

From: Joel Therien
Sent: Wednesday, June 6, 2018 1:33 PM
To: Precision Appliance Repair
Subject: Re: Letter received to Global Virtual Opportunities

Not sure if you know how a network works but this is the network we use

<https://nexusoffers.com/>

They probably have thousands of publishers... but it definitely came from someone in that marketplace as I asked others who market for us and they are not doing any SMS

On Wed, Jun 6, 2018 at 1:23 PM, Precision Appliance Repair <47usc227etseq@gmail.com> wrote:

Dear Joel Therien:

May I please have the names and contact information for the marketing firms you 'reached out to' so I may reach out to them?

Regards,

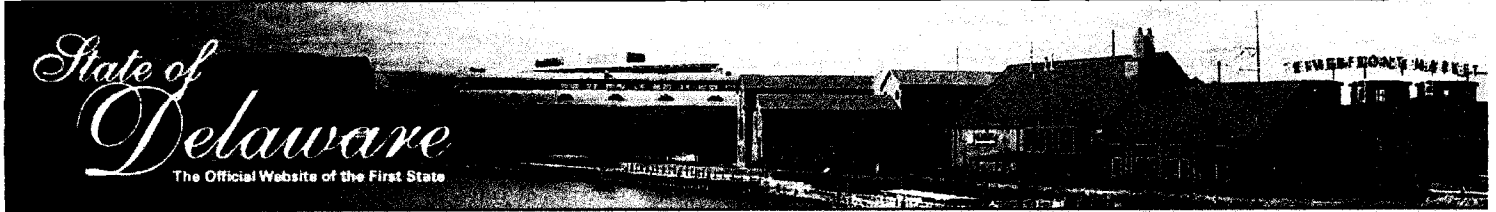
Clinton Strange

Sent from Mail for Windows 10

From: Joel Therien
Sent: Wednesday, June 6, 2018 10:05 AM
To: 47usc227etseq@gmail.com; [Ilona](#)
Subject: Letter received to Global Virtual Opportunities

Dear Mr Strange,

EXHIBIT J



Department of State: Division of Corporations

[Allowable Characters](#)**HOME**

[About Agency](#)
[Secretary's Letter](#)
[Newsroom](#)
[Frequent Questions](#)
[Related Links](#)
[Contact Us](#)
[Office Location](#)

SERVICES

[Pay Taxes](#)
[File UCC's](#)
[Delaware Laws Online](#)
[Name Reservation](#)
[Entity Search](#)
[Status](#)
[Validate Certificate](#)
[Customer Service Survey](#)

INFORMATION

[Corporate Forms](#)
[Corporate Fees](#)
[UCC Forms and Fees](#)
[Taxes](#)
[Expedited Services](#)
[Service of Process](#)
[Registered Agents](#)
[GetCorporate Status](#)
[Submitting a Request](#)
[How to Form a New Business Entity](#)
[Certifications, Apostilles & Authentication of Documents](#)

Entity Details

THIS IS NOT A STATEMENT OF GOOD STANDING

File Number: 4322394 Incorporation Date / 3/22/2007
Formation Date: (mm/dd/yyyy)

Entity Name: GLOBAL VIRTUAL OPPORTUNITIES INC.

Entity Kind: Corporation Entity Type: General

Residency: Domestic State: DELAWARE

REGISTERED AGENT INFORMATION

Name: CORPOMAX INC.

Address: 2915 OGLETOWN RD

City: NEWARK County: New Castle

State: DE Postal Code: 19713

Phone: 302-266-8200

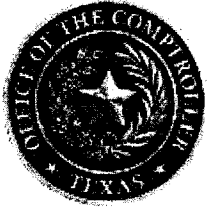
Additional Information is available for a fee. You can retrieve Status for a fee of \$10.00 or more detailed information including current franchise tax assessment, current filing history and more for a fee of \$20.00.

Would you like ☒ Status ☐ Status, Tax & History Information

For help on a particular field click on the Field Tag to take you to the help area.

[site map](#) | [privacy](#) | [about this site](#) | [contact us](#) | [translate](#) | [delaware.gov](#)

EXHIBIT K

**Franchise Tax Account Status**

As of : 05/14/2018 23:20:13

This Page is Not Sufficient for Filings with the Secretary of State**GLOBAL VIRTUAL OPPORTUNITIES, INC.****Texas Taxpayer Number** 19805312725**Mailing Address** 6701 GUADA COMA DR SCHERTZ, TX 78154-3247**Right to Transact Business in Texas** ACTIVE**State of Formation** DE**Effective SOS Registration Date** 06/15/2007**Texas SOS File Number** 0800830111**Registered Agent Name** J BRADLEY JONES**Registered Office Street Address** 2161 NW MILITARY HWY., SUITE 400 SAN ANTONIO, TX 78213

JS 44 (Rev. 06/17)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

CLINTON STRANGE

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
Pro Se:
7021 Winburn Drive
Greenwood, LA 71033

DEFENDANTS

GLOBAL VIRTUAL OPPORTUNITIES, INC.

County of Residence of First Listed Defendant GUADALUPE, TX
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

W18CA180**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

47 U.S.C. 227

Brief description of cause:

TCPA VIOLATIONS' Restrictions on the use of Telephone Equipment**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$
6,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

7-3-2018

SIGNATURE OF ATTORNEY OF RECORD

Pro Sex Clinton Strange

FOR OFFICE USE ONLY

RECEIPT # _____

AMOUNT _____

APPLYING IFP X

JUDGE _____

MAG. JUDGE _____